

1 THE HONORABLE RICHARD A. JONES  
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9 **UNITED STATES DISTRICT COURT**

10 **WESTERN DISTRICT OF WASHINGTON**

11 **AT SEATTLE**

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13 CITY OF SEATTLE, a municipal  
14 corporation, located in the County of King,  
15 State of Washington

16 v.  
17 Plaintiffs,

18 MONSANTO COMPANY, SOUTIA INC.,  
19 and PHARMACIA CORPORATION,

20 Defendants.

21 CASE NO. 2:16-cv-00107-RAJ

22 **DECLARATION OF LISA N.  
23 DEBORD IN SUPPORT OF  
24 DEFENDANTS' *DAUBERT*  
25 MOTION TO EXCLUDE THE  
26 EXPERT TESTIMONY OF LISA  
27 RODENBURG**

28 **Noted for: August 26, 2022**

Shook, Hardy & Bacon L.L.P.  
190 Carondelet Plaza, Suite 1350  
St. Louis, MO 63105  
Tel: (314) 690-0204

Lisa N. DeBord declares and states under penalty of perjury:

2       1. I am over the age of 18 and competent to be a witness herein. I am an  
3 attorney for Defendants Pharmacia LLC (“Pharmacia” or “Old Monsanto”), Monsanto  
4 Company (“New Monsanto”) and Solutia Inc. (“Solutia”) (collectively, “Defendants”) in  
5 the above-captioned action. I make this declaration in support of Defendants’ Motion to  
6 Exclude the Expert Testimony of Lisa Rodenburg filed concurrently herewith. Except  
7 where indicated otherwise, I make this declaration based on my own personal knowledge  
8 and the books and records of my firm Shook, Hardy & Bacon LLP.

9           2. Attached hereto as **Exhibit A** is a true and correct copy of the expert report  
10 of Lisa Rodenburg dated November 18, 2021, submitted by Plaintiff in this captioned-  
11 action.

12       3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from  
13 the transcript of the deposition of Lisa Rodenburg taken on April 7, 2022 in the above-  
14 captioned proceedings. Exhibit B includes the following pages from the transcript: 1, 49,  
15 53, 58-59, 66-67, 77-78, 80-83, 85-92, 96, 98-101, 109-110, 120-122, 138, 153-154, 193-  
16 194, 198-201, 205-206, 210, 223-224, 229, 234-240, 243-244, 251-253, 256, 259, 261-  
17 262, 264-265, 301-302, 307, 311-312, 314.

18       4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from  
19 the transcript of the deposition of Lisa Rodenburg in *City of Spokane v. Monsanto Co. et*  
20 *al.*, No 2:15-cv-00201-SMJ, U.S.D.C. E.D. Wash. Exhibit C includes the following pages  
21 from the transcript: 1, 16-18, 43, 51, 57-58, 61-63, 127-128, 132, 135-136, 138-142, 146,  
22 295.

23       5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from  
24 the transcript of the deposition of Lisa Rodenburg in *City of San Diego et al. v. Monsanto*  
25 *Co. et al.*, Case No. 3:15-cv-00578-WQH-AGS, U.S.D.C. S.D. CA. Exhibit D includes  
26 the following pages from the transcript: 1, 18-25, 28-37, 44, 55-58, 193.

27       6. Attached hereto as **Exhibit E** is a true and correct copy of Exhibit 15 to the  
28 deposition of Lisa Rodenburg dated April 7, 2022, the Green-Duwamish River Watershed

PCB Congener Study, prepared by Leidos dated April 2016.

7. Attached hereto as **Exhibit F** is a true and correct copy of Exhibit 29 to the deposition of Lisa Rodenburg dated April 7, 2022, the paper *Source Apportionment of Polychlorinated Biphenyls in Atmospheric Deposition in the Seattle, WA, USA Area Measured with Method 1668* dated June 5, 2019.

6           8.       Attached hereto as **Exhibit G** is a true and correct copy of Exhibit 33 to  
7 the deposition of Lisa Rodenburg dated April 7, 2022, a demonstrative of  $r^2$  values across  
8 various environmental compartments considered by Rodenburg.

9 I certify under the penalty of perjury of the law of the United States that the  
10 foregoing is true and correct to the best of my knowledge.

11 Executed this 11<sup>th</sup> day of August 2022, at St. Louis, Missouri.

By: /s/ Lisa N. DeBord  
Lisa N. DeBord